

December 12, 2001

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

RE: Olefins Panel Test Plan for High Benzene Naphthas Category, HPV Registration No.

Dear Ms. Whitman:

The Olefins Panel of the American Chemistry Council submits its test plan for the High Benzene Naphthas Category under the High Production Volume (HPV) Challenge Program. This CAS numbers included in this category are listed in the attached table.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships. The Panel has coordinated with other industry groups covering related chemicals. Additionally, and also as requested in EPA's letter, in analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach. The Panel has taken the same thoughtful approach when developing this test plan and believes it conforms to those principles.

If you have any questions, please contact Elizabeth Moran, Manager of the Olefins Panel at (301) 924-2006 or Elizabeth_Moran@americanchemistry.com.

Courtney M. Price
Vice President, CHEMSTAR

cc: C. Auer, EPA
B. Leczynski, EPA
S. Russell, ACC
J. Keith, ACC

CAS Numbers and Descriptions Associated with Streams in the High Benzene Naphthas Category

CAS Number	CAS Number Description
64741-99-7	Extracts, petroleum, light naphtha solvent
64742-49-0	Naphtha, petroleum, hydrotreated light
64742-73-0	Naphtha, petroleum, hydrodesulfurized light
64742-83-2	Naphtha, petroleum, light steam-cracked
64742-91-2	Distillates, petroleum, steam-cracked
67891-79-6	Distillates, petroleum, heavy arom.
67891-80-9	Distillates, petroleum, light arom.
68410-97-9	Distillates, petroleum, light distillate hydrotreating process, low-boiling
68475-70-7	Aromatic hydrocarbons, C6-8, naphtha-raffinate pyrolyzate-derived
68476-45-9	Hydrocarbons, C5-10 arom. conc., ethylene-manuf.-by-product
68526-77-2	Aromatic hydrocarbons, ethane cracking scrubber effluent and flare drum
68606-10-0	Gasoline, pyrolysis, debutanizer bottoms
68606-28-0	Hydrocarbons, C5 and C10-aliph. and C6-8-arom.
68921-67-5	Hydrocarbons, ethylene-manuf.-by-product distn. residues
68955-29-3	Distillates, petroleum, light thermal cracked, debutanized arom.
68956-52-5	Hydrocarbons, C4-8
68956-70-7	Petroleum products, C5-12, reclaimed, wastewater treatment
69013-21-4	Fuel oil, pyrolysis
8030-30-6	Naphtha

Note: The definitions, found in the TSCA Chemical Substance Inventory, for the CAS numbers included in this group are vague with respect to composition. Therefore, it is not uncommon to find that the same CAS number is correctly used to describe different streams (compositions) or that two or more different CAS numbers are used to describe the same stream (composition).